12.0 Responsiveness Summary

12.1 Introduction

This section contains the Army's responses to comments submitted in regard to the Proposed Plan for the On-Post Operable Unit at RMA. Comments were received from CDPHE, EPA, USFWS, Shell, city and county governments, environmental action groups, and private citizens.

PMRMA solicited comments regarding the On-Post Operable Unit Proposed Plan during a 3-month-long public comment period (October 16, 1995 to January 15, 1996). The Proposed Plan and the primary supporting documentation were made available to the public for the entirety of the public comment period. These documents were available at seven city and county libraries in the area as well as at the EPA Region VIII library. These documents, as well as the complete administrative record, were also available at the JARDF, which is located at the west entrance to RMA at 72nd Avenue and Quebec Street. A public meeting was held on November 18, 1995 to present and discuss the Proposed Plan with citizens and public officials. This Responsiveness Summary was prepared to respond to oral and written questions or concerns received by the Army during the public comment period.

The public meeting was held at RMA from approximately 9:00 a.m. to 12:30 p.m. Those in attendance included representatives from the Army, the Army's contractor (Foster Wheeler Environmental Corporation), Shell, EPA, USFWS, the state of Colorado (CDPHE), Tri-County Health Department, city and county officials, public interest groups, and citizens. A Court Reporter and Notary Public reported the proceedings of the meeting in a stenographic transcript, included as Section 12.6 and available for review in the JARDF. An agenda was prepared for the meeting and provided to attendees along with a copy of the Proposed Plan. A video, Taking Action for the Future: The Proposed Cleanup Plan for Rocky Mountain Arsenal, was presented that summarized the information provided in the Proposed Plan and a brief talk was given that described the rationale behind the selection of the preferred alternatives. A site tour of RMA was also made available to all attendees; technical experts accompanied the tours to explain ongoing remedial operations and to answer questions.

12.2 History of Community Relations Activities

The Army began developing its Community Involvement Program in the 1980s as the first environmental investigations were initiated. As part of this program, the Army has conducted one-on-one interviews and informal

Human Health Exposure Assessment for Rocky Mountain Arsenal (Ebasco 1990), Remedial Investigation Summary Report (Ebasco 1992a), Development and Screening of Alternatives Report (Ebasco 1992b), Human Health Exposure Assessment Addendum for Rocky Mountain Arsenal (Ebasco 1992c), Integrated Endangerment Assessment/Risk Characterization (Ebasco 1994), and Detailed Analysis of Alternatives Report (Foster Wheeler Environmental 1995a).

group meetings, solicited input using surveys and questionnaires, and pursued phone contacts to identify interested citizens and organizations, assess public perceptions of the issues, and determine appropriate mechanisms for engaging in two-way communication.

Educational outreach efforts have included developing several publications that describe current investigations and available remedial technologies, making literature regarding the on-post cleanup effort available to the public, and conducting open houses and public meetings. An example of a current publication includes "Update," which has been distributed to all (approximately 125,000) households within a 10-mile radius of the installation on a quarterly basis since 1990. Various topics are discussed in this quarterly pamphlet including RMA technical information and history, wildlife viewing tour schedules, educational programs, and recycling programs. The Army has also made the comprehensive documentation generated during the cleanup process available to the public in the JARDF, in the information repository maintained at the EPA Region VIII library, and at the Adams County, Aurora, Commerce City, Denver, Lakewood, Montbello, and Park Hill² libraries.

The Army held one of its largest public open houses in January 1994, following the release and distribution of the draft Detailed Analysis of Alternatives report for the On-Post Operable Unit. Regulatory agencies represented at the event were EPA, CDPHE, and Tri-County Health Department. The two primary responsible parties, Shell and the U.S. Army, were also represented, as were members of USFWS. The purpose of the event was to allow the public one-on-one experience with federal, state, and local professionals who could explain in simple terms the positions of their organizations in the various aspects of the cleanup. Videos were shown that detailed, in easy-to-understand terms, the various technologies outlined in the draft Detailed Analysis of Alternatives report. As part of the open house, the Army also offered site tours of RMA to the 1,000 citizens who attended.

Prior to April 1994, various public meetings and workshops were coordinated with interested citizens through the TRC, which was established under CERCLA guidelines. The committee, initiated at RMA in 1989, was comprised of representatives from local health and regulatory agencies, community residents, and local government. In November 1993, the TRC opened its meetings to the public. In April 1994, the Department of Defense directed military installations involved in environmental cleanup to form RABs. The RAB at RMA serves as a forum to exchange information and establish dialog among the communities, regulatory agencies, and the Army.

² Only the Proposed Plan and the Final Detailed Analysis of Alternatives report were available for review at Park Hill Library.

Other tools used by the Army to keep the public informed have included the issuance of press releases and hotline phone numbers that provide callers with up-to-date information about cleanup operations. In addition, Army representatives visit area libraries, schools and grocery stores on a regular basis to distribute flyers and brochures dealing with public meetings and cleanup and recreational activities available at RMA.

The Proposed Plan was presented to the public on October 16, 1995. Press releases were sent to a variety of local and state news media, including the Rocky Mountain News and The Denver Post. The October 1995 edition of "Update," summarized the information provided in the Proposed Plan and was sent to all households within a 10-mile radius of RMA. Legal notice of the comment period, which at that time ran from October 16 through December 15, 1995, was published in The Denver Post on October 18, 1995 and in the Rocky Mountain News October 20, 1995. It was republished in mid-December in both newspapers when the comment period was extended.

At the December 7, 1995 RAB meeting it was decided to extend the public comment period for 1 month, i.e., to January 15, 1996, at the request of some commenters. Verbal and/or written comments were accepted by PMRMA both before and after the public meeting up to the deadline of January 15, 1996.

12.3 Responses to Comments

The remainder of this section consists of the Army's responses to written questions and comments received during the public comment period.

Since 1989, all remedial investigation activities at RMA have been performed in accordance with the FFA signed by the Army, EPA, USFWS, ATSDR, Shell, U.S. Department of the Interior, and U.S. Department of Justice. By signing the FFA, these entities were made part of all decision processes at RMA. The state of Colorado elected not to sign the FFA, but has played an active role in the decision-making processes for the On-Post Operable Unit. Throughout the RI/FS process, CDPHE (previously known as Colorado Department of Health) has been involved and has provided the Army with comments on the various aspects of the remediation at RMA.

Responses to comments are presented in the following order, based on the originator of comment:

Section	Topic
12-1	Responses to CDPHE Comments Dated January 19, 1996
12-2	Responses to EPA Comments Dated January 4, 1996
12-3	Responses to USFWS Comments Dated January 19, 1996
12-4	Responses to Shell Comments Dated January 19, 1996
12-5	Responses to City and County Government Comments
	—Adams County
	—City and County of Denver
	—Northern Community Coalition

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12-6 Responses to Environmental Action Group Comments

—League of Women Voters
—Sierra Club

12-7 Public Meeting Transcript

12-8 Responses to Citizen Comments

A glossary of acronyms used in Section 12 is provided as part of the general table of contents.